

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ALAN G. STEVENS, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SEMBCORP UTILITIES PTE LTD.,

Defendant.

10 Civ. 4481 (SHS)

NOTICE OF CROSS MOTION FOR AWARD OF  
ATTORNEYS' FEES AND EXPENSES

PLEASE TAKE NOTICE that based upon the accompanying Memorandum of Law, and the Declaration of Anthony M. Candido and the exhibit attached thereto, Defendant Sembcorp Utilities Pte Ltd. ("Sembcorp"), by and through its undersigned attorneys, hereby cross moves before the Honorable Sidney H. Stein, United States District Judge, Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., New York, New York 10007, for an Order, awarding Sembcorp attorneys' fees and expenses.

Dated: New York, New York  
December 13, 2010

/s/

William E. Wallace III  
Anthony M. Candido  
John J. Song  
CLIFFORD CHANCE US LLP  
31 West 52nd Street  
New York, New York 10019  
Tel: 212-878-8000  
Fax: 212-878-8375

*Attorneys for Defendant  
Sembcorp Utilities Pte Ltd.*